

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

IN RE:

SIGNATURE PACK, LLC

Debtor.

CHAPTER 11

CASE NO. 19-20916-JRS

MOTION TO ESTABLISH BAR DATE FOR FILING PROOFS OF CLAIM

COMES NOW, Signature Pack, LLC (“Debtor”), debtor and debtor in possession in the above-captioned case, by and through the undersigned counsel, and hereby files this “Motion to Establish Bar Date for Filing Proofs of Claim” (the “Motion”). In support of the Motion, Debtor shows the Court as follows:

Jurisdiction and Background

1. This Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. On May 9, 2019, Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (“Bankruptcy Code”).

3. In accordance with Sections 1107(a) of the Bankruptcy Code, Debtor continues to manage its financial affairs as a debtor-in-possession.

Relief Requested

4. Debtor requests that the Court enter an order establishing August 9, 2019 (the “Bar Date”), as the deadline for all creditors and parties-in-interest asserting a claim¹ against Debtor arising before the Petition Date to file a proof of claim.

5. Section 105 of the Bankruptcy Code codifies the inherent equitable powers of the Bankruptcy Court. *See Croton River Club v. Half Moon Bay Homeowners’ Assoc., Inc., (In re Croton River Club)*, 52 F.3d 41, 45 (2nd Cir. 1995).

6. Rule 3003(c)(3) of the Federal Rules of Bankruptcy Procedure provides, in pertinent part, that the “court shall fix . . . the time within which proofs of claim or interest may be filed.”

7. Establishing a proof of claim bar date would assist Debtor with developing and implementing a plan of reorganization and would aid in administering the estate. Creditors will have sufficient time from the date hereof to timely file their claims.

WHEREFORE, Debtor requests that this Court enter an order establishing August 9, 2019 as the deadline for filing proofs of claim or interests in this case and granting such other and further relief as is deemed just and proper.

Respectfully submitted this 4th day of June, 2019.

JONES & WALDEN, LLC

/s/ Leslie M. Pineyro

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¹ “Claim” is defined in 11 U.S.C. §101(5).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the date indicated below a true and correct copy of the *Motion to Establish Bar Date for Filing Proofs of Claim* (the “Motion”) was served via the Bankruptcy Court’s Electronic Case Filing program, which sends a notice of and an accompanying link to the Motion to the following parties who have appeared in this case under the Bankruptcy Court’s Electronic Case Filing Program:

- Griffin B. Bell gbb@gb3pc.com, dts@gb3pc.com;admin@gb3pc.com
- Sam G. Bratton sbratton@dsda.com, kstratton@dsda.com;dbkirk@dsda.com
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- Sean C. Kulka sean.kulka@agg.com
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- Stephan A. Ray sray@mcd-r-law.com, cmanning@mcd-r-law.com;hjohnson@mcd-r-law.com
- Michael D. Robl michael@roblgroup.com
- David S. Weidenbaum david.s.weidenbaum@usdoj.gov

This 4th day of June, 2019.

JONES & WALDEN, LLC

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